

FILED

JUL - 6 2016

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA)

v.)

GUS DAHLEH)

No. **16CR 429**

Violation: Title 18, United States Code

Section 1344

Information

JUDGE KENNELLY

MAGISTRATE JUDGE GILBERT

The UNITED STATES ATTORNEY charges:

1. At times material to this information:

(a) Mortgage Direct, Inc., which had an office in Elmhurst, Illinois, was a mortgage brokerage business that assisted individuals with obtaining mortgage loans from financial institutions.

(b) Defendant GUS DAHLEH owned Mortgage Direct, Inc.

(c) Washington Mutual Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation.

(d) Lenders such as Washington Mutual Bank required applicants for loans to provide truthful information, including information regarding the applicant's employment, income, assets, and financial condition, which information was material to the approval, terms, and funding of the loans.

(e) Some lenders required loan applicants to submit to the lender verification of deposit forms, which were forms from a bank that verified how much money an applicant had in a bank account or accounts.

2. Beginning in or around 2006 and continuing until in or around 2007, at Elmhurst, in the Northern District of Illinois, and elsewhere,

GUS DAHLEH,

defendant herein, knowingly participated in a scheme to defraud financial institutions and to obtain money and funds owned by and under the custody and control of financial institutions by means of materially false and fraudulent pretenses and representations, which scheme is further described below.

3. It was a part of the scheme that DAHLEH and others who worked at Mortgage Direct fraudulently caused financial institutions to make mortgage loans by making and causing to be made materially false representations about the borrowers' income, employment and assets, in documents submitted to financial institutions, including loan documents.

4. It was further part of the scheme that DAHLEH prepared and submitted, and caused to be prepared and submitted, to financial institutions loan applications that DAHLEH knew contained false information about borrowers' qualifications, including false and fraudulent information about borrowers' income, employment, and assets.

5. It was further part of the scheme that DAHLEH and loan officers under DAHLEH's direction at Mortgage Direct falsified verification of deposit forms before providing the forms to lenders by changing the numbers on the forms and replacing them with higher numbers so that the loan applications would be approved by the lenders.

6. It was further part of the scheme that DAHLEH did misrepresent, conceal, hide, and cause to be misrepresented, concealed and hidden, the existence of the scheme, the purposes of the scheme, and the acts done in furtherance of the scheme.

7. On or about January 18, 2007, at Oak Brook, in the Northern District of Illinois, Eastern Division, and elsewhere,

GUS DAHLEH,

defendant herein, knowingly executed the scheme to defraud by causing Washington Mutual Bank to refinance a mortgage loan in the amount of approximately \$188,000 related to a property located on Chicago Road in Yorkville, Illinois;

In violation of Title 18, United States Code, Section 1344.


UNITED STATES ATTORNEY